

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
JAMES HENRY HAWKINS)	Case No. 20-30048-KLP
)	Chapter 13
)	Trustee: Carl M. Bates
Debtor)	

**NOTICE OF APPLICATION BY
KANE & PAPA, P.C. FOR SUPPLEMENTAL COMPENSATION**

Kane & Papa, P.C., counsel for the above debtor has filed a Supplemental Application for Allowance of Compensation pursuant to 11 U.S.C. §§ 330(a) and 503(b)(2) and Federal Rules of Bankruptcy Procedure 2016.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the application, or if you want the court to consider your views on the application, then, within fourteen (14) days from the date of this Notice you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
KANE & PAPA, P.C.
P.O. Box 508
Richmond, Virginia 23218-0508

- Attend the hearing scheduled for **June 3, 2020 at 10:00 a.m. at 701 East Broad Street, Room 5100, Richmond, VA 23219**. If no timely response has been filed, the Court may grant the relief sought in the application without a hearing.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Application and may enter an Order granting relief sought in the application, and may enter an Order granting that relief without a hearing.

Dated: May 15, 2020

KANE & PAPA P.C.

By: /s/ James E. Kane
James E. Kane (VSB #30081)
KANE & PAPA, P.C.
P.O. Box 508
Richmond, VA 23218-0508
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATE OF SERVICE

I certify that on May 15, 2020, I have transmitted a true copy of the foregoing document electronically through the court's CM/ECF system or by mail to the debtor, chapter 13 trustee, the United States trustee if other than by the electronic means provided for at Local Bankruptcy Rule 2002-1, and to all necessary parties as listed on the matrix attached herewith.

/s/ James E. Kane
James E. Kane
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
JAMES HENRY HAWKINS)	Case No. 20-30048-KLP
)	Chapter 13
)	Trustee: Suzanne E. Wade
Debtor)	

**APPLICATION BY KANE & PAPA, P.C.
FOR SUPPLEMENTAL COMPENSATION**

COMES NOW, Kane & Papa P.C., counsel for debtor, and pursuant to 11 U.S.C. §§ 330(a), 331(b)(2), and 503(b)(2) and Federal Rules of Bankruptcy Procedure 2016, respectfully applies to the Honorable Court for approval and payment of supplemental fees in the amount of \$1,754.50 which includes attorney fees of \$1,754.00 and costs of \$4.50.

1. The period covered by this application is for additional work not included in the initial “no-look” fees through the date of this Application.
2. Fees in the amount of \$5,434.00 have either been previously paid by the debtor or approved for payment through the Chapter 13 Plan.
3. James E. Kane was admitted to practice law in 1989 and has been practicing for 30 years. The hourly rate charged by James E. Kane is \$350.00 per hour for attorney time.
4. Pursuant to Bankruptcy Rule 2016(b), a Disclosure of Compensation of Attorney for Debtor(s) has been filed in this case and Notice of Filing of Rule 2016-1 Disclosure of Compensation was served on the Debtor and the Standing Trustee pursuant to LBR 2016. No objection to the compensation requested in the Disclosure Statement has been filed by either the Standing Trustee or the Debtor.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
P.O. Box 508
Richmond, VA 23218-0508
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

5. Supplemental Compensation is requested for time and costs related to the following services:

Professional services rendered to the debtor in connection with the preparation and filing of an Adversary Proceeding to Determine Validity, Extent and Priority of Lien pursuant to 11 U.S.C. § 506(a) filed on January 20, 2020, resulting in a judgments in favor of Debtor entered by the Court on April 1, 2020 and May 12, 2020.

6. Charges have not been included for the preparation and cost for noticing of the fee application and any court appearances related to the application. An itemized statement of services and fees is attached hereto as Exhibit "A" and is incorporated herein by this reference.
7. James E. Kane has reviewed the Debtor's budget and believes that the Chapter 13 Plan provides sufficient reserves or may be extended in time so that payments requested herein may be made without prejudice to any creditor. Upon information and belief, payment of the requested compensation will not reduce the dividend to unsecured creditors as provided in the most recently confirmed Chapter 13 Plan.

WHEREFORE, Kane & Papa P.C., respectfully requests this Honorable Court to approve supplemental fees in the amount of \$1,754.50 to be paid through the Chapter 13 plan as an administrative expense claim pursuant to 11 U.S.C. 503.

Respectfully submitted,

KANE & PAPA P.C.

By: /s/ James E. Kane
James E. Kane (VSB #30081)
KANE & PAPA, P.C.
P.O. Box 508
Richmond, VA 23218-0508
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATE OF SERVICE

I certify that on May 15, 2020, I have transmitted a true copy of the foregoing document electronically through the Court's CM/ECF system or by mail to the debtors, chapter 13 trustee, the United States trustee if other than by the electronic means provided for at Local Bankruptcy Rule 2002-1, and to all necessary parties, as listed on the matrix attached herewith.

/s/ James E. Kane

James E. Kane
Counsel for Debtor

Kane & Papa, P.C.
PO BOX 508
RICHMOND, VA 23218 US
804-225-9500
jkane@kaneandpapa.com

INVOICE

BILL TO

James Hawkins
6819 Silliman Drive
Chesterfield, VA 23832

INVOICE # 5998

DATE 05/15/2020

DUE DATE 06/01/2020

TERMS Due on receipt

DATE	ACTIVITY	QTY	RATE	AMOUNT
01/20/2020	Consulting:Legal Review property valuation on 6819 Silliman Drive, Chesterfield, VA from, tax assessment; review first and second DOTs and, balances with U.S. National Bank/Select Portfolio Servicing, Inc.; review judgment and lien by Western Development, LLC; review judgment and lien by Joseph Jenkins, Jr. Funeral Home, Inc.	1.10	350.00	385.00
01/20/2020	Consulting:Legal Prepare Complaint against Western Development, LLC and Joseph Jenkins, Jr. Funeral Home, Inc. and file with the Court	1.30	350.00	455.00
01/22/2020	Consulting:Legal Review Summons and serve Summons and Complaint on Western Development, LLC and Joseph Jenkins, Jr. Funeral Home, Inc. and file certificate of service and file with court	0.30	350.00	105.00
01/22/2020	Postage and Delivery Postage and Copy Charges		2.50	2.50
03/23/2020	Consulting:Legal Review Motion of Western Development to Extend Time to File Answer; review Answer of Western Development	0.20	350.00	70.00
03/27/2020	Consulting:Legal Negotiate settlement with counsel for Western Development; review Consent Order prepared by counsel for Western Development, LLC and approve the same	0.50	350.00	175.00
03/31/2020	Consulting:Legal	1.20	350.00	420.00

DATE	ACTIVITY	QTY	RATE	AMOUNT
	Prepare Motion for Entry of Default and Default Judgment against Joseph Jenkins, Jr. Funeral Home, Inc. and file with the Court and serve on defendant			
03/31/2020	Postage and Delivery Postage and Copy Charges			2.00
05/08/2020	Consulting:Legal Prepare Order Granting Default Judgment against Joseph Jenkins, Jr. Funeral Home, Inc. and submit to Court for entry	0.40	350.00	140.00

Hawkins v. Western Development, LLC and Joseph Jenkins, Jr. Funeral Home, Inc.

BALANCE DUE

\$1,754.50

Label Matrix for local noticing
0422-3
Case 20-30048-KLP
Eastern District of Virginia
Richmond
Fri May 15 15:29:56 EDT 2020

U.S. Bank, N.A., successor trustee to J.S. All
c/o Shapiro & Brown, LLP.
501 Independence Parkway
Suite 203
Chesapeake, Va 23320-5174

UST smg Richmond
Office of the U. S. Trustee
701 East Broad St., Suite 4304
Richmond, VA 23219-1849

United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219-1888

Ballato Law Firm
3721 Westerre Parkway
Suite A
Henrico, VA 23233-1332

Credit Acceptance
25505 West 12 Mile Rd
Suite 3000
Southfield, MI 48034-8331

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Joseph Jenkins Funeral Home
2011 Grayland Ave
Richmond, VA 23220-5807

Mrs. Haeja O. Namkoong
8651 Nesselwood Rd
Henrico, VA 23229-3170

Select Portfolio Servicing, Inc
Attn: Bankruptcy
Po Box 65250
Salt Lake City, UT 84165-0250

Select Portfolio Servicing, Inc.
P.O. Box 65250
Salt Lake City, UT 84165-0250

T Mobile/T-Mobile USA Inc
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118-7901

Verizon
P.O. Box 660720
Dallas, TX 75266-0720

Verizon
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118-7901

WESTERN DEVELOPMENT, LLC
GOODWIN-JONES & PRICE, PC
20 S. AUBURN AVE.
RICHMOND, VA 23221-2910

Western Development, LLC
3610 South Place
Alexandria, VA 22309-2201

Westviewfnsv
1068 Temple Ave
Colonial Heights, VA 23834-2981

James E. Kane
Kane & Papa, PC
1313 East Cary Street
P.O. Box 508
Richmond, VA 23218-0508

James Henry Hawkins
6819 Silliman Drive
Chesterfield, VA 23832-8340

John P. Fitzgerald, III
Office of the US Trustee - Region 4 -R
701 E. Broad Street, Ste. 4304
Richmond, VA 23219-1849

Suzanne E. Wade
341 Dial 877-996-8484 Code 2385911
7202 Glen Forest Drive, Ste. 202
Richmond, VA 23226-3770

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-9617

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) Western Development, LLC
3610 South Place
Alexandria, VA 22309-2201

End of Label Matrix
Mailable recipients 20
Bypassed recipients 2
Total 22